

**Ferree, Melissa A. (DNREC)**

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**From:** Ferree, Melissa A. (DNREC)  
**Sent:** Wednesday, December 31, 2014 8:48 AM  
**To:** 'Sam Ghezavat'  
**Cc:** Corash, Michele; David Barber; Ev Ashworth  
**Subject:** RE: BE - Delaware Operations

All,

The following temporary EPA ID numbers have been assigned to the Bloom Energy sites in Delaware:

BE Manufacturing Center Delaware: DEP000002044  
BE Redlion: DEP000002045  
BE Brookside: DEP000002046  
BE JP Morgan: DEP000002047

Each temporary EPA ID number is valid for one shipment of hazardous waste. Please also note that for the two facilities Bloom indicated as large quantity generators (Redlion and Brookside), Bloom will be required to submit an annual report detailing waste generation for the calendar year in which the sites were large quantity generators. Given that today is 12/31, I presume the shipments will occur in 2015. As such, the annual report for calendar year 2015 will be due March 1, 2016.

I hope all of you have a happy new year! If you have any questions, please do not hesitate to let me know.

Thanks,  
Melissa

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**From:** Sam Ghezavat [mailto:Sam.Ghezavat@bloomenergy.com]  
**Sent:** Tuesday, December 30, 2014 7:21 PM  
**To:** Ferree, Melissa A. (DNREC)  
**Cc:** Corash, Michele; David Barber; Ev Ashworth  
**Subject:** RE: BE - Delaware Operations

Thank you Melissa for your follow up. Please note below the requested information. Please let us know if you have any questions.

Regards;

Sam Ghezavat,  
Desk: 408-543-1056 Cell: 408-203-6895  
[WWW.Bloomenergy.com](http://WWW.Bloomenergy.com)

# Be Safe

**TRIAD TRANSPORT INC**

USDOT Number: 285929

EPA ID: OKD 981588791

**Triad Transport**

Permit: DE-HW-0413

Expires 12/31/2016

Phone: 9184264751

PO Box 818 Fax: 9184264770

McAlester, OK 74502

TSD Facility: US Ecology P O Box 307. Petronila Road, Robertson  
Texas, 78380

Texas Hazardous Waste Permit: HW- 50052-001

EPA Permit No: TXD 069452340-1

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**From:** Ferree, Melissa A. (DNREC) [<mailto:melissa.ferree@state.de.us>]**Sent:** Tuesday, December 30, 2014 2:56 PM**To:** Ev Ashworth**Cc:** Corash, Michele; Sam Ghezavat**Subject:** RE: BE - Delaware Operations

All,

I just wanted to follow up on Sam's voicemail from yesterday; I left him a return voicemail late yesterday afternoon, but haven't heard back, so I'm not sure if he got it or not. The only thing the Department is waiting on at this point to issue the temporary EPA ID numbers is the name and EPA ID number of both the transporter and the TSD. As soon as we receive that information, we'll be able to issue the temporary numbers.

Thanks,  
Melissa

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**From:** Ev Ashworth <[EAshworth@algcorp.com](mailto:EAshworth@algcorp.com)>**Sent:** Wednesday, December 24, 2014 3:30 PM**To:** Ferree, Melissa A. (DNREC)**Cc:** Corash, Michele; Sam Ghezavat**Subject:** FW: BE - Delaware Operations

Melissa:

Your colleagues at the front desk are not in, and I thought it better to send an email than provide a voice mail. I write to update you on the status of Bloom Energy's applications for a temporary EPA waste ID. Given that the Christmas holiday is now upon us, we thought it best to provide the following:

- 1) Attached are the applications for the temporary waste ID. We fully understand that DNREC will not process the applications until Bloom has identified the licensed transporter and the TSDF where the used canisters will be shipped for treatment, storage and disposal. However, the process of putting in place contracts with the TSDF has taken a bit more time than we appreciated at the onset, as the canisters are unique to BE's operations (as opposed to a standard 55 gallon waste container). Sam Ghezavat and his colleagues at BE are working diligently on this issue, and have been in contact with several TSDFs and are close to executing the necessary agreements. The licensed transporter should not be an issue – thanks for forwarding over the list.
- 2) Note that the applications identify LQG status for only two facilities: BE Redlion and BE Brookside. The other two facilities will accumulate hazardous waste below the 2,200 pound/month threshold.
- 3) We have completed the training of all BE staff at all four facilities. The LQG facilities have written training plans and contingency plans in place, and we will have records of training/weekly inspections in place too.
- 4) We will keep you posted on the selection of the TSDF – we are seeking letters of acceptance from the TSDF and expect to receive these shortly.
- 5) We attach an example of the Uniform Waste Manifests that we have for shipment of the hazardous wastes from Unitcat in Texas to the TSDF. You've asked us for a single example, but let us know if you need additional manifests.
- 6) Note that the applications provide a single RCRA waste code: D018 (benzene). We confirmed with Sam G. and Bloom that metals that were identified were based on California only testing (California uses a different waste extraction test than the EPA TCLP). We have confirmed that RCRA metals are below EPA's established toxicity threshold for RCRA metals.

Thanks again for your help in coordinating the Temporary ID for BE. I'd welcome a call or email if there are any questions, etc. – it's best to reach my on my cell until Monday, December 29 when I'll be back in the office.

My colleagues here join me in extending our best wishes for the Christmas holiday.

Best, Ev



Everard Ashworth | Principal

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